

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

JOHN THIBODEAUX, AMY THIBODEAUX :
GABRIELLE THIBODEAUX, AND EMILY : Civil Action 6:18-00501
THIBODEAUX :
VERSUS : Judge:
: :
J.M. DRILLING, LLC, ADMIRAL INSURANCE : Magistrate:
COMPANY, ROCKHILL INSURANCE :
COMPANY, AND BELLSOUTH :
TELECOMMUNICATIONS, LLC :
:

REPLY TO OPPOSITION TO MOTION TO TRANSFER BY
BELLSOUTH TELECOMMUNICATIONS, LLC

NOW INTO COURT, through undersigned counsel, comes Defendant, ROCKHILL INSURANCE COMPANY (hereinafter sometimes referred to as "Rockhill"), who respectfully offers this Reply to the *Memorandum of Intervenor, Claimant in Cross Claim, and Claimant in Counter Claim, in Opposition to Motion to Transfer* filed by BellSouth Telecommunications, LLC ("Bellsouth") (Doc. 20).

MAY IT PLEASE THE COURT:

In its Opposition, Bellsouth states that it adopts and incorporates in full the arguments set forth by the Thibodeauxs in their *Opposition to Motion to Transfer* (Doc. 18). (Doc. 20, pg. 1). Accordingly, in response to Bellsouth's adoption, Rockhill asserts herein the same arguments as previously made in *Reply to Plaintiffs' Opposition to Motion to Transfer*.

WHEREFORE, Defendant, ROCKHILL INSURANCE COMPANY, respectfully asks that this Honorable Court grant *Defendant's Motion to Transfer* and stay all

proceedings in the above captioned matter until the West District of Tennessee, Eastern Division can adjudge whether to consolidate the actions.

CERTIFICATE OF SERVICE

Respectfully Submitted,

I HEREBY CERTIFY that on the 14th day PERKINS & ASSOCIATES, LLC:

of June 2018 I filed the foregoing *Reply to* By: /s/ Mark A. Perkins
Opposition Motion to Transfer by BellSouth Mark A. Perkins, #18529
Cody Grosshart, #37143

Telecommunications, LLC with the 401 Market St., Suite 900
CM/ECF system through which a copy Shreveport, LA 71105
was provided to all counsel of record. T: (318) 222-2426
F: (318) 222-0456

/s/ Mark A. Perkins